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HEFNER, STARK & MAROIS, LLP

Howard S. Nevins (CA Bar Assn. No. 119366)

Aaron A. Avery (CA Bar Assn. No. 245448)

2150 River Plaza Drive, Suite 450

Sacramento, CA 95833-3883

Telephone: (916) 925-6620

Fax No: (916) 925-1127

Email: aavery@hsmlaw.com

Proposed Attorneys for
GEOFFREY RICHARDS,
Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
(Sacramento Division)**

In re

PATRICK L. SKAGGS AND
SHALEE G. SKAGGS,

Debtors.

Case No.: 13-25727-D-7

DC No.: HSM-002

NO HEARING SET

**STIPULATION EXTENDING TIME TO FILE A COMPLAINT OBJECTING TO
DISCHARGE OF DEBTORS**

This stipulation (the "Stipulation") is hereby entered into by and between PATRICK L. SKAGGS and SHALEE G. SKAGGS (the "Debtors"), through their Counsel, Mohammad M. Mokarram, Esq., and GEOFFREY RICHARDS, the duly appointed Chapter 7 Trustee ("Trustee") in the Debtors' pending bankruptcy case, through the Trustee's proposed counsel, Aaron A. Avery, Esq., of Hefner, Stark & Marois, LLP. The deadline to file an a Complaint Objecting to Discharge of Debtors is presently set for July 29, 2013. The Trustee and the Debtors have agreed to extend the deadline for the Trustee to object to the Debtors' discharge until **October 28, 2013**.

1. Pursuant to Federal Rule of Bankruptcy Procedure 4004(b), the Court may, for cause, extend the time to file a complaint objecting to discharge.

2. Cause exists for the agreed upon extension in that the Trustee is presently investigating at least one transfer made by the Debtors which may be avoidable, as well as

1 the Debtors' assets, liabilities, and financial affairs. The circumstances of the potentially
 2 avoidable transfer, and the Debtors' cooperation in the above matters, is important to the
 3 Trustee's administration of this estate, and the Debtors' cooperation, or lack thereof, may be
 4 a factor in the evaluation of any possible objection to discharge.

5 3. The parties agree that the deadline within which the Trustee may file a complaint
 6 objecting to the Debtors' discharge shall be extended until October 28, 2013.

7 **IT IS SO AGREED:**

8 Dated: July 17, 2013

HEFNER, STARK & MAROIS, LLP

By 

Aaron A. Avery, Proposed Attorneys for
 GEOFFREY RICHARDS, Chapter 7 Trustee

12 Dated: July 17, 2013

By 

Mohammad M. Mokarram, Attorneys for
 PATRICK L. SKAGGS AND SHALEE G.
 SKAGGS, Debtors

HEFNER, STARK & MAROIS, LLP
 Sacramento, California